



DEPARTMENT OF
TECHNOLOGY SERVICES

Robert Billingsley, Cable Administrator
703.228.3195
2100 Clarendon Boulevard Suite 610 Arlington, Virginia 22201

January 23, 2013

FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RE: Reply Comments Cable Television Technical and Operational Requirements -- MB
Docket No. 12-217

As the Cable Administrator for Arlington County, VA, I submit these reply comments to express my support for the comments of the National Association of Telecommunications Officers and Advisors (NATOA) and to urge the Commission to adopt the proposed cable performance and technical standards rules¹ with the modifications to the rules recommended by NATOA. Contrary to claims by the industry, there is a need for new cable performance and technical rules. Subscribers have filed numerous complaints about digital cable service with our local jurisdiction.

Arlington County is the local franchising authority for Arlington County, VA and handles cable television subscriber complaints and local enforcement of the Commission's technical standards. Our community is served by Comcast and Verizon FiOS who have been offering digital television services since 2011 and 2006, respectively.

¹ *Cable Television Technical and Operational Requirements*, Notice of Proposed Rulemaking, MB Docket No. 12-217, FCC 12-86 (rel. Aug. 3, 2012).

Complaints Data. In the past six years, we have received at least twenty-five subscriber complaints about digital television service quality. Our office's records show that we have received over 50 complaints about the picture quality of Comcast digital broadcasts since June of 2011 when Comcast first employed digital technology. We have also received 5 complaints about picture quality of Verizon services for the same time period. A look at complaints before that time would probably reveal additional problems with Verizon's picture quality using digital technology.

In our experience, there are likely more problems with signal quality than have been reported to our office. That is because subscribers usually call the cable television provider first to report complaints and not everyone who has a complaint contacts our office, even if the cable television provider is unable or unwilling to resolve the issue.

When our office receives a complaint, it is after the customer has attempted to resolve the complaint directly with the cable company and their issue is still unresolved. This means we receive the most egregious problems due to a lack of ability on the TV Cable provider's part to resolve the problem. We document the complaint, and forward a copy of the document with the specifics of the complaint to the company. In addition, we follow up to ensure the problem gets resolved by the provider, and provide a self addressed, stamped postcard to the complainant that can be sent back to the Cable Administrator's Office, in the event the problem is not finally resolved. We believe our efforts to address these types of technical complaints with the cable company would be more effective if the Commission would issue up-to-date technical standards.

In summary, we strongly believe that in order to ensure that high-quality digital transmissions are provided to consumers, the Commission must adopt updated rules to enable testing of digital video, just as previously required by regulation for analog video. Thus, we urge the Commission to adopt the proposed rules, with the changes described in NATOA's filings.

Respectfully submitted,

Robert Billingsley, Cable Administrator
703.228.3195
2100 Clarendon Boulevard Suite 610
Arlington, Virginia 22201

ARLINGTON COUNTY, VA (LFA)

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cc: Steve Traylor, Executive Director, National Associations of Telecommunications
Officers and Advisors